

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

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BABY DOE, A CITIZEN OF AFGHANISTAN	:	
CURRENTLY RESIDING IN NORTH	:	
CAROLINA, BY AND THROUGH NEXT	:	CIVIL ACTION NO. 3:22-CV-49
FRIENDS, JOHN AND JANE DOE;AND JOHN	:	
AND JANE DOE, CITIZENS OF AFGHANISTAN:	:	
AND LEGAL GUARDIANS OF BABY DOE,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JOSHUA MAST, STEPHANIE MAST, RICHARD	:	
MAST, KIMBERLEY MOTLEY, AND AHMAD	:	
OSMANI,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
UNITED STATES SECRETARY OF STATE	:	
ANTONY BLINKEN AND UNITED STATES	:	
SECRETARY OF DEFENSE GENERAL	:	
LLOYD AUSTIN,	:	
	:	
Nominal Defendants.	:	

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**PLAINTIFFS' SUPPLEMENTAL MEMORANDUM IN SUPPORT  
OF EXPEDITED MOTION TO SHOW CAUSE WHY DEFENDANTS  
JOSHUA AND STEPHANIE MAST SHOULD NOT BE HELD IN CONTEMPT  
FOR VIOLATING THE COURT'S PROTECTIVE ORDER**

On January 24, 2023, Plaintiffs filed their Expedited Motion To Show Cause Why Defendants Joshua and Stephanie Mast Should Not Be Held In Contempt For Violating The Court's Protective Order (ECF No. 141) (the "Contempt Motion"). Plaintiffs file this

Supplemental Memorandum in support of the Contempt Motion to bring to the Court's attention that CBS broadcast this morning a second installment regarding this matter. This second installment provides additional evidence of the Masts' contumacious conduct. In particular, it includes additional photographic and video images of Baby Doe that could have been obtained only from the Masts. In addition, Joshua Mast is shown passing unknown materials to the CBS reporter. See [https://www.cbs.com/shows/video/f256eqF8EX7ojnNe\\_EWKGX8\\_TeFSCmNb/](https://www.cbs.com/shows/video/f256eqF8EX7ojnNe_EWKGX8_TeFSCmNb/)

Accordingly, Plaintiffs ask that, in addition to the relief sought in their Contempt Motion, the Court order the Masts to produce immediately to the Court and to Plaintiffs copies of whatever materials (including information {such as photographs and video imagery) that directly or indirectly identifies Plaintiffs or their families) the Masts have provided to CBS, whether before, during, or after the in-person interviews.<sup>1</sup>

Date: January 25, 2023

Respectfully submitted,

/s/ Maya Eckstein

Maya M. Eckstein (VSB No. 41413)  
Lewis F. Powell III (VSB No. 18266)  
HUNTON ANDREWS KURTH LLP  
951 E Byrd Street  
Richmond, VA 23219  
Telephone: (804) 788-8200  
Fax: (804) 788-8218  
Email: meckstein@HuntonAK.com  
Email: lpowell@HuntonAK.com

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<sup>1</sup> Plaintiffs note that page 3 of the Contempt Motion contains an incorrect date. The reference to "January 24, 2022" at the bottom of that page should read "January 24, 2023."

Jeremy C. King (*admitted pro hac vice*)  
HUNTON ANDREWS KURTH LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 309-1000  
Fax: (212) 309-1100  
Email: [sfirst@HuntonAK.com](mailto:sfirst@HuntonAK.com)  
Email: [jking@HuntonAK.com](mailto:jking@HuntonAK.com)

Sehla Ashai (*admitted pro hac vice*)  
ELBIALLY LAW, PLLC  
704 East 15th Street  
Suite 204  
Plano, TX 75074  
Telephone: (312) 659-0154  
Email: [ashai@elbiallylaw.com](mailto:ashai@elbiallylaw.com)

Blair Connelly (*admitted pro hac vice*)  
Zachary Rowen (*admitted pro hac vice*)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americans  
New York, NY 10029  
Telephone: (212) 906-1200  
Email: [blair.connelly@lw.com](mailto:blair.connelly@lw.com)  
Email: [Zachary.rowen@lw.com](mailto:Zachary.rowen@lw.com)

Damon Porter (*admitted pro hac vice*)  
Ehson Kashfipour (*admitted pro hac vice*)  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW, Suite 1000  
Washington, DC 20004-1304  
Telephone: (202) 637-2001  
Email: [damon.porter@lw.com](mailto:damon.porter@lw.com)  
Email: [ehson.kashfipour@lw.com](mailto:ehson.kashfipour@lw.com)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of January 2023, I electronically mailed the foregoing to counsel of record in this case.

By: /s/ Maya M. Eckstein  
Maya M. Eckstein (VSB # 41413)  
Hunton Andrews Kurth LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219-4074  
Telephone: (804) 788-8200  
Facsimile: (804) 788-8218  
meckstein@HuntonAK.com

*Counsel for Plaintiffs*